

From: [Carson Brewer](#)
To: [McInnes, Alan](#); [Rebecca Gitlen](#); [Lindsay Bass](#)
Subject: FINAL Memorandum of Understanding - Dean v. Jones and Hobgood - 5:16-CT-3109-FL
Date: Tuesday, May 18, 2021 5:19:00 PM
Attachments: [Dean v. Solomon \(516-CT-03109-FL\) - Memorandum of Understanding FINAL.pdf](#)
[image001.png](#)

Please see attached.

Thank you,



Case Manager/Courtroom Deputy to
U.S. Magistrate Judge Robert T. Numbers II
United States District Court
Eastern District of North Carolina
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IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION
No. 5:16-CT-03109-FL

Willie James Dean, Jr.,

Plaintiff,

v.

Johnnie Jones & Charles C. Hobgood,

Defendants.

Memorandum of Understanding

After participating in a court-hosted settlement conference, the parties have agreed to resolve this case. The parties will draft a settlement agreement including all terms, but the principle terms are:

1. Within eight weeks from the execution of the settlement agreement by all parties and counsel:
 - a. NCDPS will arrange a meeting for Dean with a veterans' benefits coordinator to discuss potential benefits Dean may be eligible for and the process for modifying his discharge status. NCDPS cannot guarantee Dean's eligibility for benefits or that his discharge status will be modified.
 - b. NCDPS will also provide a "road map" to lowering his Security Risk Group Status.
 - c. NCDPS will arrange for Dr. Peiper to review Dean's current mental health treatment and recommend any changes deemed appropriate. If Dean has specific concerns, he should submit them in writing to his psychologist

within two weeks. The psychologist will then convey the concerns to Dr. Peiper.

- d. NCDPS will place \$250 in his trust fund account coded to exclude NCDPS debt.

2. If Dean does not incur a Class A or B infraction before September 7, 2021, NCDPS will:

- a. Lower Dean to Level 2 Security Threat Group.
- b. Place Dean on medium custody status.
- c. Transfer him to Harnett Correctional Institution. The transfer will occur as soon as practicable considering bed space and public health concerns.

NCDPS will give Dean priority for the transfer.

3. Dean will file his stipulation of dismissal upon satisfaction of all terms of the settlement agreement.